

September 28, 2005

Mr. Tom Turner
Associate Regional Counsel
U. S. EPA – Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, IL 60604



RE:

RRG/Clayton Chemical Site, Sauget, IL General Notice of Potential Liability Letter

Dear Mr. Turner:

CHEMCENTRAL Midwest Corporation, an Illinois Corporation, for and on behalf of itself and all other related and/or affiliated corporate entities ("CHEMCENTRAL"), is in receipt of your General Notice of Potential Liability Letter concerning the above referenced site and dated September 27, 2005. This is to advise U. S. EPA that CHEMCENTRAL has been in contact with the RRG/Clayton Chemical Site PRP Group and has agreed to join the Group as a "Non-performing Member". This action has been taken without admission of liability at the site and CHEMCENTRAL will participate only to the extent that it is appropriate, under the circumstances.

CHEMCENTRAL has already taken the steps of executing the PRP agreement and has reviewed and signed the proposed Administrative Order on Consent (AOC) that has been disseminated by EPA and the Department of Justice. It is CHEMCENTRAL's understanding that its participation in this process will be limited under the scope of the PRP Agreement, which has been recognized within the terms of the AOC.

I trust this fully presents CHEMCENTRAL's position in regards to your letter. Should you have any questions, or require any additional information from CHEMCENTRAL, please contact me at (708)325-2412.

Sincerely,

DANIEL H. BRÉNNÁN, JR CORPORATE ATTORNEY

CC:

F. S. Mueller/Johnson & Bell

S. W. Ach